

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Division

WILLIAMS, LARRY T.; WILLIAMS, OCTAVIA H

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

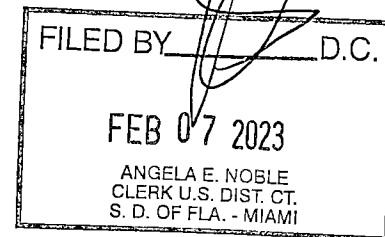
J.P. MORGAN MORTGAGE ACQUISITION
CORP.; RUSHMORE LOAN MANAGEMENT
SERVICES

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	WILLIAMS, LARRY T. ; WILLIAMS, OCTAVIA H.
Street Address	18901 NW 17 TH COURT
City and County	MIAMI, MIAMI DADE
State and Zip Code	FL 33056
Telephone Number	305-494-0820
E-mail Address	MEDCAREONE@HOTMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	J.P. MORGAN MORTGAGE ACQUISITION CORP
Job or Title <i>(if known)</i>	
Street Address	383 MADISON AVE, 8 TH FLOOR
City and County	NEW YORK
State and Zip Code	NY 10179
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	RUSHMORE LOAN MANAGEMENT SERVICES
Job or Title <i>(if known)</i>	
Street Address	15480 LAGUANA CANYON ROAD
City and County	IRVINE
State and Zip Code	CA 92618
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

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II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* WILLIAMS, LARRY T. & OCTAVIA H., is a citizen of the State of *(name)* FLORIDA.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) J.P. MORGAN MORTGAGE ACQ, is incorporated under the laws of the State of (name) DELAWARE, and has its principal place of business in the State of (name) NEW YORK.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

THE MATTER IS RELATED TO FORECLOSURE ON CERTAIN MORTGAGE UPON PROPERTY LOCATED AT LOT 5, BLOCK 10 OF FIRST ADDITION TO PALMLAND ESTATES, ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 60, PAGE 82, OF THE PUBLIC RECORDS OF MIAMI-DADE COUNTY, FLORIDA.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

PLAINTIFF HAS REQUESTED PROOF OF TRANSFER OF TITLE, AN OFFER OR CONSIDERATION MADE BY J.P. MORGAN MORTGAGE ACQUISITION CORP, AN AGREEMENT AND / OR CONTRACT SIGNED BY BOTH PARTIES, FREE LOOK PERIOD, OR THAT WOULD OTHERWISE SERVE AS OBLIGATION TO PAY A DEBT. AS SUCH, PLAINTIFF HAS MADE REQUEST FOR CERTIFICATE OF GOOD STANDING FROM THE STATE OF DELWARE TO DO BUSINESS IN THE STATE OF FLORIDA, PROOF OF TRANSFER OF PROMISSORY NOTE AND / MORTGAGE NOTE AND HAS FILED AGAINST THE PLAINTIFF IN AN INFERIOR COURT WITHOUT THE JURISDICTION TO PROCEED OVER THIS MATTER. AS SUCH, DEFENDANT LACKS STANDING TO INITIATE A LAWSUIT.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

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PLAINTIFF REQUESTS RELIEF IN THE AMOUNT OF \$495,000 FOR IMPROPER FILING, AND FOR DAMAGE TO THE PLAINTIFF CONSUMER CREDIT WORTHINESS. PLAINTIFF MAKES THE STATEMENTS TO BE TRUE AND CORRECT TO THE BEST OF THE PLAINTIFFS ABILITY, AND REQUESTS TO THAT ANY ADDITIONAL AND APPROPRIATE RELEIF ALSO BE GRANTED.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/07/2023

Signature of Plaintiff

3/20/2023 T. A.R.R.

Printed Name of Plaintiff

larry-tyrone: williams, beneficiary/suborgee

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address